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Attorneys for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

PIROUZ SEDAGHATY,

Defendant.

CR 05-60008

**DECLARATION OF WILLIAM
TEESDALE, CHIEF
INVESTIGATOR, FEDERAL
PUBLIC DEFENDER'S OFFICE**

I, William Teesdale, declare:

1. I am currently employed as the Chief Investigator for the Federal Public Defender's Office for the District of Oregon. I am also a member of the bars of Oregon and England. Since August 22, 2007, I have been one of the investigators assigned to work on the above-captioned case.

2. As part of my investigative duties relating to this case, I attended a meeting that took place on January 10, 2008, between Chief Deputy Federal Defender Stephen R. Sady and AUSA Charles Gorder at the United States Attorney's Office. Also present for that meeting was Stephen Borgen, a Regional Security Officer with the Department of Justice.

3. On January 14, 2008, Mr. Sady prepared a memorandum to file. I reviewed it before its completion and agreed that it accurately reflected the content of the meeting that I attended.

4. In early December, 2008, Mr. Sady prepared a declaration regarding the steps he took to safeguard the item that was the subject of the meeting with Mr. Gorder. At Mr. Sady's request, I reviewed the content of his declaration, and in particular those portions of his declaration that discussed meetings or other events where I was present. Mr. Sady specifically wished me to look at the paragraphs discussing the meeting that he had with Mr. Gorder at the United States Attorney's Office on January 10, 2008. I did review those paragraphs and informed Mr. Sady that I agreed with his summary of the content of the meeting.

5. On October 11, 2011, I reviewed a declaration dated October 7, 2011, sworn to by AUSA Charles Gorder. Mr. Gorder's declaration discusses, in part, the meeting that occurred on January 10, 2008.

6. Mr. Gorder's recollection of what he said is not consistent with my recollection of the meeting or my contemporaneous notes. Mr. Gorder's statement that any protection was limited to members of the prosecution team is inconsistent with my recollection of the meeting and my contemporaneous notes. Mr. Sady was careful during the meeting not to identify the specific case that the item in question related to, although Mr. Gorder did speculate about the issue. There was no discussion, however, about any limitation to any prosecution team.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 12th day of October, 2011.



William Teesdale